

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

KATE EVERINGHAM and MARISSA  
HAGY, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

ARCADIA PUBLISHING INC.,

Defendant.

Case No. 2:24-cv-00487-DCN

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT**

Patricia Kate Everingham and Marissa Hagy ("Plaintiffs"), through their attorneys, individually and on behalf of all others similarly situated, hereby move this Court to:

1. Grant preliminary approval of the settlement described in the "Settlement Agreement" between Plaintiffs and Arcadia Publishing Inc. ("Defendant" or "Arcadia Publishing").
2. Preliminarily certify the Settlement Class for purposes of Settlement;
3. Appoint Kate Everingham and Marissa Hagy as Class Representatives;
4. Appoint Raina Borrelli of Strauss Borrelli PLLC as Settlement Class Counsel;
5. Approve the notice plan set forth in the Settlement Agreement;
6. Appoint Verita as Settlement/Claims Administrator;
7. Approve the form and content of the Short Form Notice (Ex. A), Long Form Notice (Ex. B), and Claim Form (Ex. C);

8. Schedule a Final Fairness Hearing to consider entry of a final order approving the Settlement, final certification of the Settlement Class for settlement purposes only, and the request for attorneys' fees, costs, and expenses, and Plaintiffs' service awards.

This Motion is based upon: (1) this Motion; (2) the accompanying Memorandum in support; (2) the Declaration of Raina C. Borrelli filed in support; (6) the Settlement Agreement; (7) the [Proposed] Preliminary Approval Order; (8) the records, pleadings, and papers filed in this action; and (9) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

Dated: August 19, 2024

Respectfully submitted,

By: /s/Karolan Ohanesian  
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